

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LARRY G. DOCKERY,

On behalf of himself and
all others similarly situated,

Plaintiffs,

v.

Civil Action No. 2:17-4114 (MMB)

STEPHEN E. HERETICK; et al.,

Defendants,

and

NEW YORK LIFE INSURANCE COMPANY;
et al.,

Nominal Defendants.

**MOTION OF DEFENDANTS J.G. WENTWORTH S.S.C. LIMITED
PARTNERSHIP AND 321 HENDERSON RECEIVABLES ORIGINATIONS LLC
TO DISMISS PLAINTIFF'S CLASS ACTION COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), Defendants J.G. Wentworth S.S.C. Limited Partnership ("Wentworth") incorrectly identified in the Complaint as J.G. Wentworth Originations LLC, and 321 Henderson Receivables Originations LLC ("Henderson"), incorrectly identified in the Complaint as 321 Henderson Receivables LLC, hereby move the Court for an Order dismissing Plaintiff's Complaint with prejudice. The grounds for this motion are set forth in Wentworth and Henderson's Memorandum of Law, which is filed contemporaneously herewith.

DATED: April 27, 2018

Respectfully submitted,

/s/ A. Christopher Young

A. Christopher Young, PA I.D. No. 55742

Joseph C. Crawford, PA I.D. No. 30844

Samuel D. Harrison, PA I.D. No. 324276

PEPPER HAMILTON LLP

3000 Two Logan Square

Eighteenth & Arch Streets

Philadelphia, PA 19103-2799

(215-981-4000)

youngac@pepperlaw.com

Attorneys for Defendants J.G. Wentworth

S.S.C. Limited Partnership and 321 Henderson

Receivables Originations LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LARRY G. DOCKERY,

On behalf of himself and
all others similarly situated,

Plaintiffs,

v.

Civil Action No. 2:17-4114 (MMB)

STEPHEN E. HERETICK; et al.,

Defendants,

and

NEW YORK LIFE INSURANCE COMPANY;
et al.,

Nominal Defendants.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Dismiss was filed electronically where it is available for viewing and download or was served by first-class mail to the following recipients on April 27, 2018 as indicated below:

<p>Jerome M. Marcus, Esquire Jonathan Auerbach, Esquire MARCUS & AUERBACH LLC 1121 N. Bethlehem Pike Suite 60-242 Spring House, PA 19477 <i>Counsel for Plaintiffs</i></p> <p>(via ECF)</p>	<p>Jeffrey B. McCarron, Esquire SWARTZ CAMPBELL & DETWEILER Two Liberty Place – 28th Floor 50 South 16th Street Philadelphia, PA 19102 <i>Counsel for</i> <i>Stephen E. Heretick, Esquire</i></p> <p>(via ECF)</p>
<p>Structured Settlement Investments, L.P. 4269 State Road Drexel Hill, PA 19026</p> <p>(via First Class Mail)</p>	<p>Samuel W. Cortes, Esquire Melissa E. Scott, Esquire FOX ROTHSCHILD LLP 747 Constitution Drive – Suite 100 Exton, PA 19341-0673 <i>Counsel for Seneca One Finance, Inc.</i></p> <p>(via ECF)</p>
<p>Stephen R. Harris, Esquire Susan J. Strauss, Esquire DRINKER, BIDDLE & REATH LLP One Logan Square 18th & Cherry Streets Philadelphia, PA 19103-6996 <i>Counsel for Metropolitan Life Insurance</i> <i>Company and New York Life Insurance</i> <i>Company</i></p> <p>(via ECF)</p>	<p>Mark R. Kehoe, Esquire Yvette N. Bradley, Esquire MCELROY DEUTSCH MULVANEY & CARPENTER, LLP One Penn Center 1617 John F. Kennedy Blvd. Suite 1500 Philadelphia, PA 19103 <i>Counsel for Symmetra Life Insurance Co.</i></p> <p>(via ECF)</p>

Dated: April 27, 2018

/s/ A. Christopher Young

A. Christopher Young, PA I.D. No. 55742